

**Brush Wellman's Response
to the
GAO Report**

Docket H-005C
Ex. 2-5

On May 19, 2000, the United States General Accounting Office (GAO) released a report entitled "Government Responses to Beryllium Uses and Risks." The report responds to a request by a bi-partisan group of Members of Congress, and provides "information on beryllium's uses and risks and...describes key events that illustrate the evolution of the federal government's response to risks posed by beryllium."

The United States General Accounting Office is sometimes called the investigative arm of Congress or the "congressional watchdog." **GAO is independent and nonpartisan**, and has been investigating and reporting to Congress since 1921.

The GAO report is significant in three respects:

1. It refutes the charge that industry and government "conspired" to kill an OSHA safety plan for beryllium in the mid- to late-1970's.
2. It discusses at length the interaction between government and industry in the development of beryllium powder as an oxidizer in solid rocket propellants. Contrary to media claims that industry and government placed profits and national security ahead of worker safety, the account of the rocket fuel issue shows the industry foregoing a significant profit opportunity, and the government foregoing a staggering increase in fuel performance because of health concerns.
3. It chronicles the Department of Energy experience with chronic beryllium disease (CBD). That experience sharply contrasts with the version propagated by the media.

The OSHA Safety Standard

Because the GAO investigation was prompted by media charges of a "conspiracy" among DOE, DOD and industry to derail the 1975 OSHA proposal, it is significant that the GAO report does not come forth with any evidence to support this conspiracy theory.

To the contrary, the report states that the concerns relating to the OSHA proposal were based on technical infeasibility, impact on national security and the scientific evidence. Furthermore, the report points out that the proposal was motivated by cancer concerns, not CBD. Moreover, the report states that according to OSHA officials, work on the beryllium proposal was discontinued because of other priorities, all of which disprove media assertions.

Historical Evolution of Knowledge about CBD.

Media accounts have long distorted the truth and mislead readers through a failure to understand what knowledge existed at specific points in history. By doing this, they judge past events by standards of scientific and medical knowledge which did not exist at the time.

The GAO report does a great service by summarizing and clarifying how knowledge about CBD evolved over time within the Department of Energy. This information can help to place decisions made on CBD by government and industry in their proper context, and in direct contrast to the manner in which these decisions were treated by the news media.

In that vein, of particular interest are the following GAO findings:

- The incidence of CBD appeared to significantly decline at DOE facilities from the **1970's** through **1984**, which led the agency to assume that CBD "was occurring only among workers who had been exposed to high levels of beryllium decades earlier, such as the **1940's**."
- The investigation of a new case of CBD in **1984** found that "the affected worker had repeatedly been exposed to beryllium at levels greater than [the OSHA limits]."
- "During the late **1980's**, medical advances allowed for earlier and easier detection of chronic beryllium disease and sensitivity to beryllium."

Government and Industry Product Stewardship

Another media misconception is that the beryllium industry has sold product to other entities without regard to the safety of their workers, and without notifying them of the risks involved. Brush Wellman, for its part, has always conducted extensive product stewardship programs, working with customers to promote health and safety.

GAO details an excellent example of this stewardship. In the **1960's**, during the early years of rocketry development, the military began development of a solid rocket propellant with beryllium powder as an oxidizer that improved the performance of the fuel **10-30%**. This was a huge technical breakthrough in these early days.

The GAO report outlines the work of government and industry to carefully assess the risk of open-air firings of rockets utilizing beryllium in solid rocket fuel. Just as important, the report also states that "all beryllium propellant and motor testing has been discontinued since **1970**," for safety reasons, notwithstanding the impressive technological and commercial benefits of such an application.

Summary

The GAO report is an important document in the historical examination of the use of beryllium in the United States. It is interesting that these milestone events were missed during the “exhaustive” media investigations of the beryllium industry. The report provides independent third party confirmation of many points that Brush Wellman makes in *A Chronicle of Reckless Reporting*, which can be found on our website www.BeFACTS.com. This confirmation should provide an enlightening contrast to the broad and reckless assertions made in media accounts.

For example:

- GAO outlines the improving state of knowledge over time about chronic beryllium disease, especially with regard to medical diagnostic techniques.
- GAO reports the activity surrounding OSHA’s 1975 proposal to lower the exposure standard for beryllium, and suggests no evidence of improper activity by any party.
- On the contrary, GAO states that the proposal was not adopted at that time because of valid and rational reasons centered on public policy and scientific research.
- The GAO report outlines extensive government and industry cooperation on researching the potential health risks of beryllium-fueled rockets, research that ultimately led to the discontinuation of beryllium in rocket propellants.

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